

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

IN THE MATTER OF:	)	BK. NO. 24-40384
	)	
WILLIE LANE SHANNON, JR.	)	CHAPTER 13
SSN: ###-##-9262	)	
LAURA M. SHANNON	)	
SSN: ###-##-9249	)	
	)	
Debtors.		

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN (Doc 63)**

COMES NOW, ERIN M. MCCARTNEY, Chapter 13 Trustee, and objects to confirmation of the plan pursuant to 11 U.S.C. § 1324 and Neb. R. Bankr. P. 3015-3(B) for the following reason(s):

1. It appears the calculation of the payment schedule in Part 1 of the amended plan does not equal the Total Base Amount listed. (More specifically, \$3,650.00 for 24 months does not equal \$84,000.00, and consequently, the total base amount of \$133,200.00 also appears inaccurate.) Clarification will be necessary.
2. Part 11 of the amended plan includes a provision that appears to constitute argument, evidence, or legal conclusions more properly offered in support of the objection to claims.

WHEREFORE, Trustee prays that the Trustee's Objection to Confirmation be sustained.

DATED: December 24, 2024

s/ Erin M. McCartney  
Erin M. McCartney #23663  
Chapter 13 Trustee  
13930 Gold Circle, Suite #201  
Omaha, NE 68144  
(402) 697-0437  
1-800-884-0437

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the Trustee's Objection was served on CHRISTOPHER J GAMM, debtors attorney, via the CM/ECF system of the United States Bankruptcy Court and a copy was mailed on December 24, 2024, by first-class, U.S. mail, postage prepaid to the Debtors at the addresses listed below:

WILLIE LANE SHANNON, JR.  
7548 WHITLOCK PLACE  
LINCOLN, NE 68516-5786

LAURA M. SHANNON  
7548 WHITLOCK PLACE  
LINCOLN, NE 68516-5786

s/ Erin M. McCartney  
Erin M. McCartney